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**From:** Sills, Robert L.  
**Sent:** Monday, February 26, 2007 6:46 PM  
**To:** Ken Feinberg; Craig, Gregory; William R. Jentes  
**Cc:** Van Tol, Pieter; Zeballos, Gonzalo; Fried, Lisa; Chang, Eric  
**Subject:** RE: Attached Briefing Order  
**Follow Up Flag:** Follow up  
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Dear Messrs. Feinberg, Craig and Jentes:

I write in response to Storm's email of earlier today requesting an indefinite adjournment of the February 28 deadline for filing responses to the Panel's Interim Order Directing Further Briefing of February 12 (the "Interim Order").

Telenor Mobile notes that Storm waited until just before its supplemental brief was due under the terms of the Interim Order to request an extension; that the Ukrainian order from which Storm allegedly requires relief before going forward in this proceeding was granted in an action brought by Storm's own corporate parent, Alpren; and that no such application has yet been made. Those facts strongly suggest that Storm's request is part of its continuing strategy of delay.

Notwithstanding that, Telenor Mobile takes no position on whether a short, but fixed, extension in the briefing schedule should be granted to both parties, during which Storm may take whatever action it wishes in the Ukrainian courts. However, given the collusive nature of the Ukrainian litigation, and Storm's demonstrated ability to obtain whatever results it wishes in that case, Telenor Mobile is strongly opposed to the open-ended extension sought by Storm. Were Storm's application to be granted, the schedule for this proceeding would be effectively under the Ukrainian courts' (and, consequently, Storm's) control, and not this Panel's.

On December 18, the Panel denied Storm's most recent application for an indefinite stay of this proceeding based on the Ukrainian litigation Storm's parent Alpren is pursuing against Storm. Storm's current attempt to obtain a similar stay should be similarly rejected, and in order to allow the case to move forward, the Panel should either adhere to the existing schedule or extend the date for the submission of briefs by both parties in response to the Interim Order for a short, finite period.

Respectfully,

Robert L. Sills